

## Exhibit 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

SVETLANA LOKHOVA )  
Plaintiff, )  
v. ) Civil Action No. 1:20-cv-1603(LMB)(WEF)  
STEFAN A. HALPER )  
Defendant/Counterclaimant )

## **Declaration of Terrance G. Reed**

I, Terrance G. Reed, state and affirm the following based upon my personal knowledge:

1. I am counsel for Defendant/Counterclaimant Stefan Halper in *Lokhova v. Halper*, No. 1:20-cv-1603 (E.D. Va.) (hereinafter “*Lokhova I*”) and I was previously counsel for Defendant Halper in *Lokhova v. Halper*, No. 1:19-cv-00632 (E.D. Va.) (hereinafter “*Lokhova II*”).

2.

3. Defendant Halper has filed an Answer to the Amended Complaint, and it includes affirmative defenses. *See* D.E. 65. Plaintiff has not filed any answer to the counterclaims, and any such answer was due on September 29, 2022 under the Court's scheduling order (D.E. 66), or twenty days after the Court's denial of Plaintiff's motion to dismiss, which occurred on September 9<sup>th</sup>. D.E. 107.
4. During the discovery period from July 15, 2022 until the dismissal of Plaintiff's case on October 7, 2022, I personally spent, as Halper's counsel in *Lokhova II*, 190.5 hours of time on necessary legal work, including seeking discovery of Plaintiff; responding to Plaintiff's motions for a protective order, to dismiss or for summary judgment, for disqualification; responding to Plaintiff's discovery objections and appeal; and related proceedings. This does not include the time spent by defense counsel in defending this suit during the 19 month period from December 2020 until July 15, 2022. Nor does this time include the time spent by other counsel in this case, including Robert Luskin and Thomas Lankford. I spent 43.25 hours of my time preparing for the deposition of Plaintiff. An itemization of this time is attached as Exhibit 3.
5. The Court has previously determined in this case that an hourly rate of \$500 per hour is a reasonable rate for an attorney of my experience. Applying this hourly rate to the hours expended equals \$95,250.00, of which \$21,625 represents time spent preparing for Plaintiff's deposition. In addition, the cost for the Plaintiff's deposition in London was \$3,015.99, as reflected in the invoice attached as Exhibit 4.
6. Plaintiff pursued an appeal of this case to the Fourth Circuit, claiming that she needed discovery to respond to Defendant's privilege defense, but then refused to produce

responsive discovery on remand during the discovery period, and made no affirmative discovery requests of Defendant in this case at any time.

7. Attached as Exhibit 5 are excerpts from Plaintiff's book Spygate Exposed taken verbatim from the referenced pages.

8. Attached as Exhibit 6 is the self-published book Spygate Exposed.

9. Attached as Exhibit 7 is an email sent to me on November 2, 2021 from Plaintiff counsel Steven Biss stating that Plaintiff did not have the money to pay the outstanding judgment against her.

10. On page 347 of Spygate Exposed, Plaintiff states:

The tension led to the cancellation of my UK publishing contract as I was considered too controversial and damaging the brand. As for my American publisher, they ran a mile. They would not even acknowledge the receipt of my completed manuscript they had commissioned.

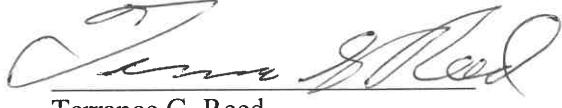
11. Attached as Exhibit 8 are tweets from Plaintiff's Twitter account claiming that the government contract payments to Halper are from a "slush fund."

12. I have employed the search function available upon the electronic version of Spygate Exposed to determine how many times the name of Stefan Halper is mentioned in the book. The search function indicates that his name appears 1,150 times in the book.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2022,

Alexandria, Virginia



Terrance G. Reed  
Terrance G. Reed